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VIA ECF

Hon. Gregory H. Woods United States District Court Daniel Patrick Moynihan United States Courthouse Southern District of New York 500 Pearl Street, Room 2260 New York, NY 10007-1312

MEMORANDUM ENDORSED

Re: Flynn, et ano. v. CNN, 1:21-Cv-02587 (S.D.N.Y., March 25, 2021)

Dear Judge Woods:

We represent Cable News Network, Inc. ("CNN") in the above-captioned matter. On December 16, 2021, the Court granted CNN's Motion to Dismiss ("Motion"), with leave to amend, as to Plaintiffs' defamation claim, but denied CNN's Motion as to Plaintiffs' false light claim. CNN respectfully requests a fifteen-day extension of its time to move, answer, or otherwise respond to Plaintiffs' false light claim, from December 30, 2021 to January 14, 2022. CNN requests this additional time so that CNN can respond to Plaintiff's false light claim and to a repleaded defamation claim, if any, by single motion and/or answer. Counsel has consented to this request.

CNN has made one previous request for an extension of time, to move, answer, or otherwise respond to Plaintiffs' first amended complaint, on May 18, 2021. Thank you for the Court's consideration of this request.

Respectfully submitted,

Davis Wright Tremaine LLP

/s/ Katherine M. Bolger

Katherine M. Bolger

cc: Counsel of Record (via ECF)

Application granted. The deadline for Defendant to answer or otherwise respond to the complaint is extended to January 14, 2022. The Clerk of Court is directed to terminate the potion pending at Dkt. No. 43.

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SO ORDERED.

Dated: December 21, 2021 New York, New York GREGORYH. WOODS United States District Judge